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*[Additional Counsel Appear on Signature Page]*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

LUCAS CRANOR, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ILLUMINATE EDUCATION, INC.,

Defendant.

Case No. 8:22-cv-1404

Class Action

**PLAINTIFF'S NOTICE OF  
PENDENCY OF OTHER ACTIONS  
OR PROCEEDINGS**

**[Local Rule 83.1-4]**

1 TO: THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

2 In accordance with Local Rule 83-1.4, Plaintiff Lucas Cranor hereby gives  
3 notice of the pendency of the following actions under Central District of California  
4 Local Rule 83-1.4.

5 This case involves substantially the same subject matter as two other actions  
6 outside of this district:

- 7 a. *Sarah Chung v. Illuminate Education, Inc.*, No. 1:22-  
8 cv-03110-HG, pending in the United States District  
9 Court for the Eastern District of New York (the “*Chung*  
10 action”), before Judge Hector Gonzalez; and  
11 b. *JeanPaul Magallanes, Guardian Ad Litem for Jacob*  
12 *Magallanes v. Illuminate Education, Inc., et al.*,  
13 No. 56-0222-005673214-CU-MC-VTA, pending in  
14 the Superior Court of the State of California, County of  
15 Ventura (the “*Magallanes*” action), in Dept. 43.

16 **A. Description of the Actions.**

17 The above-captioned case and the *Chung* and *Magallanes* actions are both  
18 class actions against a common defendant, Illuminate Education, Inc., in relation to  
19 a data breach that occurred in December 2021.

20 **B. Case Information for the Related Actions.**

21 1. The Plaintiff in the E.D.N.Y. *Chung* action is represented by the  
22 following counsel:

23 James Chung  
24 LAW OFFICE OF JAMES CHUNG  
25 43-22 216th Street  
26 Bayside, NY 11361  
27 718-461-8808  
28 Email: *jchung\_77@msn.com*

1  
2 Spencer I. Sheehan  
3 SHEEHAN & ASSOCIATES, P.C.  
4 60 Cuttermill Road, Ste 412  
5 Great Neck, NY 11021  
6 516-268-7080  
7 Fax: 516-234-7800  
8 Email: *spencer@spencersheehan.com*

9 2. The Plaintiff in the *Magallanes* action is represented by the following  
10 counsel:

11 Mark D. Potter (SBN 166317)  
12 James M. Treglio (SBN 228077)  
13 POTTER HANDY LLP  
14 100 Pine Street, Suite 1250  
15 San Francisco, CA 94111  
16 Tel: (858) 375-7385  
17 Facsimile: (888) 422-5191  
18 Email: *mark@potterhandy.com*  
19 *jimt@potterhandy.com*

20 **C. Relationship of the Actions.**

21 The above-captioned case and the *Chung* and *Magallanes* actions involve the  
22 same facts and the same legal questions. Importantly, each action arises from an  
23 alleged data breach that occurred in December 2021 and each action involves the  
24 same defendant, Illuminate Education, Inc. The actions assert similar causes of  
25 action against Illuminate Education, Inc. in relation to the alleged data breach.  
26  
27  
28

DATED: July 28, 2022

Respectfully submitted,

**KAPLAN FOX & KILSHEIMER LLP**

By: /s/ Laurence D. King  
Laurence D. King

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Proposed Class*